

**THE OFFICE OF REGULATORY STAFF
DIRECT TESTIMONY AND EXHIBITS
OF
THOMAS H. ALLEN**



DOCKET NO. 2010-337-C

**Petition for a Rule to Show Cause as to Why
the Certificates of Public Convenience and
Necessity for Certain Providers of
Telecommunications Service Should Not be
Revoked**

TESTIMONY OF THOMAS H. ALLEN

FOR

THE OFFICE OF REGULATORY STAFF

DOCKET NO. 2010-337-C

**IN RE: PETITION FOR A RULE TO SHOW CAUSE AS TO WHY THE
CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY FOR
CERTAIN PROVIDERS OF TELECOMMUNICATIONS SERVICE SHOULD
NOT BE REVOKED**

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND
OCCUPATION.**

A. My name is Thomas H. Allen. My business address is 1401 Main Street, Suite 900, Columbia, South Carolina 29201. I am employed by the state of South Carolina as the Tariff Administrator in the Telecommunications, Transportation, Water and Wastewater Department for the Office of Regulatory Staff ("ORS").

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
PROCEEDING?**

A. The purpose of my testimony is to present evidence that certain telecommunications companies subject to this Commission's jurisdiction have failed to file the Universal Service Fund Contribution Worksheet ("USF Report") with the ORS, which is the administrator of the Universal Service Fund ("USF").

**Q. DO PUBLIC SERVICE COMMISSION USF GUIDELINES REQUIRE
TELECOMMUNICATIONS COMPANIES TO FILE THE UNIVERSAL
SERVICE FUND CONTRIBUTION WORKSHEET?**

1 A. Yes. The Commission Guidelines approved in Order No. 2001-996, require each
2 telecommunication company to file, on an annual basis, the information necessary
3 to allow ORS to calculate the company's USF contribution.

4 **Q. AS PART OF YOUR JOB DUTIES, HAVE YOU REVIEWED THE USF**
5 **CONTRIBUTION WORKSHEETS ON FILE WITH ORS?**

6 A. Yes. As part of my job duties, I reviewed each USF Contribution Worksheet filed
7 by telephone companies with the ORS. USF Contribution Worksheets were due
8 from telephone companies on July 1, 2010. On August 10, 2010, I mailed each
9 delinquent telephone company a letter to remind them of their obligation to return
10 the USF Report.

11 **Q. PLEASE EXPLAIN EXHIBIT THA-1 ATTACHED TO YOUR**
12 **TESTIMONY.**

13 A. Exhibit THA-1 identifies those telecommunication companies that failed to file the
14 required USF Contribution Worksheet by the time this proceeding was initiated.

15 **Q. PLEASE EXPLAIN EXHIBIT THA-2 ATTACHED TO YOUR TESTIMONY.**

16 A. Exhibit THA-2 identifies telecommunication companies which have come into
17 compliance by filing the required USF Contribution Worksheets since the time of the
18 initiation of this proceeding.

19 **Q. WHAT RESPONSE, IF ANY, HAS THE ORS RECEIVED FROM THE**
20 **TELECOMMUNICATION COMPANIES NAMED IN THE RULE TO SHOW**
21 **CAUSE PETITION?**

22 A. The ORS has received responses from some of the companies who have since come
23 into compliance with Commission rules and regulations. To the extent additional

1 companies come into compliance before the Commission hearing, ORS will present a
2 revised Exhibit THA-1 and Exhibit THA-2 to accurately reflect only those companies
3 who remain out of compliance during the Commission hearing.

4 **Q. WHAT ACTION DOES THE ORS RECOMMEND THAT THE**
5 **COMMISSION TAKE?**

6 A. The ORS recommends that the Commission revoke the Certificates of Public
7 Convenience and Necessity for those telecommunication companies who have not
8 complied with the USF Contribution Worksheet requirements as of the hearing date.

9 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

10 A. Yes it does.

**OUT OF COMPLIANCE RTSC
DOCKET No. 2010-337-C**

EXHIBIT THA-1

#	OrganizationName	Registered Agent	Secretary of State status	Foreign or Domestic	Docket #	Order #	Date Certificate Issued
1	Andiamo Telecom, L.L.C. Joseph M. Rao--General Manager 10575 N. 114th, Suite 103 Scottsdale, AZ 85259	Business Filings International 2 Office Park Court, Suite 103 Columbia, SC 29223	Good Standing	Foreign	2004-252-C	2005-75	02/10/05
2	Genesis Telecommunications Company, LLC Ken Jefferson--President PO Box 675 Greenwood, SC 29648	John Lawrence 1117 Reynolds Ave Greenwood, SC 29646	Good Standing	Domestic	2000-350-C	2000-873	10/27/00
3	Netlojix Telecom, Inc. Greg Wilson--CFO 7001 Blvd. 26 #323 N. Richland Hills, TX 76180	National Registered Agents, Inc. 2 Office Park Court, Suite 103 Columbia, SC 29223	Reinstatement	Foreign	1999-485-C	2000-463	06/05/00
4	Network US, Inc. dba Affinity One Energy Center 40 Shuman Blvd., Suite 270 Naperville, IL 60563	National Registered Agents, Inc. 2 Office Park Court, Suite 103 Columbia, SC 29223	Forfeiture	Foreign	2001-302-C	2002-218	03/26/02
5	Telecare, Incorporated Michelle Barnett--Regulatory Officer 444 Lafayette Rd. Noblesville, IN 46060	Corporation Service Company 1703 Laurel St. Columbia, SC 29201	Good Standing	Foreign	1992-320-C	1992-891	10/21/92
6	Telenational Communications, Inc. John Jenkins--Regulatory Officer 5408 N 99th Street Omaha, NE 68134	Incorp Services, Inc. 317 Ruth Vista Lexington, SC 29073	Good Standing	Foreign	2002-266-C	2003-97	02/22/03
7	Uni-Tel Communications Group, Inc. Bob Blumberg--Regulatory Contact 932 N. Wright Street, Suite 104 Naperville, IL 60563	National Registered Agents, Inc. 2 Office Park Court, Suite 103 Columbia, SC 29223	Good Standing	Foreign	2000-403-C	2001-299	04/05/01
8	Universal Telecom, Inc. Shannon Gray--Regulatory Officer PO Box 679 LaGrange, KY 40031	C T Corporation System 2 Office Park Court, Suite 103 Columbia, SC 29223	Good Standing	Foreign	1999-354-C	1999-886	12/16/99

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2010-337-C

IN RE: Petition of the Office of Regulatory Staff for
Commission to Order a Rule to Show Cause
as to Why The Certificates of Public
Convenience and Necessity for Certain
Providers of Telecommunications Services
Should Not be Revoked

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**CERTIFICATE OF
SERVICE**

This is to certify that I, Chrystal L. Morgan, have this date served one (1) copy of the **DIRECT TESTIMONY AND EXHIBITS OF THOMAS H. ALLEN** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Andiamo Telecom, L.L.C. c/o Business Filings International 2 Office Park Court, Suite 103 Columbia, SC 29223	Genesis Telecommunications Company, LLC c/o John Lawrence 1117 Reynolds Ave Greenwood, SC 29646
Netlojix Telecom, Inc. c/o National Registered Agents, Inc. 2 Office Park Court, Suite 103 Columbia, SC 29223	Telecare, Incorporated c/o Corporation Service Company 1703 Laurel St. Columbia, SC 29201
Network US, Inc. dba Affinity c/o National Registered Agents, Inc. 2 Office Park Court, Suite 103 Columbia, SC 29223	Uni-Tel Communications Group, Inc. c/o National Registered Agents, Inc. 2 Office Park Court, Suite 103 Columbia, SC 29223
Universal Telecom, Inc. c/o C T Corporation System 2 Office Park Court, Suite 103 Columbia, SC 29223	Telenational Communications, Inc. c/o Incorp Services, Inc. 317 Ruth Vista Lexington, SC 29073

Chrystal L. Morgan

November 3, 2010
Columbia, South Carolina